



Application GRANTED. Defendants' deadline to respond to the Complaint is extended to **February 29, 2024**. The initial pretrial conference previously scheduled for January 2, 2024 is adjourned to **March 20, 2024 at 11:00 a.m.** The Clerk of Court is respectfully directed to terminate the motion at ECF No. 17.

Dated: December 18, 2023
New York, New York

SO ORDERED.

JESSICA G. L. CLARKE
United States District Judge

December 15, 2023

Via ECF

Hon. Jessica G. L. Clarke, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, NY 10007

MEMO ENDORSED

Re: *Continental Casual Company v. Feldman et al.*,
23-cv-8102 (the "Action")

Dear Judge Clarke:

We represent Defendant John Shannon ("Shannon") in the above-referenced action. On behalf of Shannon and Defendant Ziel Feldman ("Feldman," and with Shannon, "Defendants") as well as Plaintiff Continental Casualty Company ("Continental"), we write to respectfully request (1) an adjournment ***on consent*** of Defendants' time to respond to the Complaint in this matter from December 18, 2023 to February 29, 2024, and (2) an adjournment of the Initial Pretrial Conference in this matter from January 2, 2024 at 10:00 a.m. to sometime after March 1, 2024. No previous requests for such relief have been made.

There are two reasons for these requests. First, another Defendant in the Action, Nir Meir ("Meir"), has not yet been served with the Complaint and Continental has a pending application to the Court (ECF Doc. No. 16) seeking to extend its time to serve Meir until February 12, 2024 and for alternative service upon him. From a practical perspective, to conserve judicial resources and in the interest of efficiency, Defendants and Continental do not believe it makes sense to go forward with the Initial Pretrial Conference or to require Defendants to respond to the Complaint until after Meir has been served and respectfully request that the Initial Pretrial Conference occur after Defendants respond to the Complaint. Second, Defendants and Continental wish to adjourn the above dates in order to continue to engage in settlement discussions that potentially could resolve this action without the need for further litigation. As set forth above, this application is made ***on consent***. The Initial Pretrial Conference is also the next scheduled appearance before the Court. Counsel for Defendants and Continental are available to appear for an Initial Pretrial Conference on March 7, 13, or 20.



Hon. Jessica G. L. Clarke, U.S.D.J.
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Thank you for your attention to this application.

Respectfully submitted,

MINTZ & GOLD LLP

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Cc: Counsel of record

Via ECF

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